

UNITED STATES DISTRICT COURT

for the

Southern District of California

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of themselves
and all others similarly situated,

Plaintiff(s)

v.

FENIX INTERNATIONAL LIMITED, FENIX INTERNET LLC,
BOSS BADDIES LLC, MOXY MANAGEMENT, UNRULY
AGENCY LLC (also d/b/a DYSRPT AGENCY), BEHAVE
AGENCY LLC, A.S.H. AGENCY, CONTENT X, INC., VERGE
AGENCY, INC., AND ELITE CREATORS LLC,

Defendant(s)

Civil Action No. 8:24-cv-01655-FWS-SSC

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* FENIX INTERNATIONAL LIMITED
9th Floor, 107 Cheapside
London, EC2V 6DN
United Kingdom

(See Attachment A)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Christopher R. Pitoun (SBN 290235)
HAGENS BERMAN SOBOL SHAPIRO LLP
301 N. Lake Avenue, Suite 920
Pasadena, California 91101
Telephone: (213) 330-7150; Facsimile: (213) 330-7152
Email: christopherp@hbsslaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Brian D. Karth
CLERK OF COURT

Date: August 2, 2024

/s/

Jenny Lam

Signature of Clerk or Deputy Clerk



Civil Action No. 8:24-CV-01655-FWS-SSC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This summons for: **VERGE AGENCY, INC.**
was received by me on **August 6, 2024**

☐ I personally served the ((SEE DOCUMENTS ON ATTACHED LIST)) on the individual at on

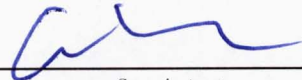
☐ I left the __ at __ with __, a person of suitable age and discretion who resides there, on __, and mailed a copy to the individual's last known address; or

☒ I served the SUMMONS IN A CIVIL ACTION; COMPLAINT; CIVIL COVER SHEET; NOTICE TO ASSIGNMENT TO UNITED STATES JUDGES; NOTICE TO COUNSEL RE CONSENT TO PROCEED BEFORE A UNITED STATES MAGISTRATE JUDGE; CIVIL STANDING ORDER; NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM; CERTIFICATION AND NOTICE OF INTERESTED PARTIES to Eresident, Inc., Agent for Service of Process by serving Lilly Ashley, authorized person to accept service of process, who is designated by law to accept service of process on behalf of VERGE AGENCY, INC. on (date) August 7, 2024 at 1013 Centre Road, Suite 403S, Wilmington, DE 19805; or
☐ other (specify):

My fees are \$ for travel and \$ for services, for a total of \$ 445.00

I declare under penalty of perjury that this information is true.

Date: **8/7/2024**



Server's signature

Gilbert Del Valle

Printed name and title

Ace Attorney Service, Inc.

800 S. Figueroa Street, Suite 900, Los Angeles, CA 90017

Phone: (213) 623-3979 / Fax: (213) 623-7527

Registration No.: / County:

Server's Address

Additional information regarding attempted service, etc.:

N.Z., R.M., B.L., S.M., and A.L., individually and on behalf of themselves and all others similarly situated vs FENIX INTERNATIONAL LIMITED, et al.

Christopher R. Pitoun (SBN 290235)
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Robert B. Carey (*pro hac vice* forthcoming)
Michella A. Kras (*pro hac vice* forthcoming)
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED,
FENIX INTERNET LLC, BOSS
BADDIES LLC, MOXY
MANAGEMENT, UNRULY AGENCY
LLC (also d/b/a DYSRPT AGENCY),
BEHAVE AGENCY LLC, A.S.H.
AGENCY, CONTENT X, INC., VERGE
AGENCY, INC., AND ELITE
CREATORS LLC,

Defendants.

Case No. _____

CLASS ACTION COMPLAINT

**ACTION SEEKING
STATEWIDE OR NATIONWIDE
RELIEF**

DEMAND FOR JURY TRIAL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

N.Z., et al. v. FENIX INTERNATIONAL LIMITED, et al.
Case No. 8:24-cv-01655-FWS-SSC

ATTACHMENT A TO SUMMONS

DEFENDANTS TO BE SERVED (CONTINUED):

FENIX INTERNET LLC
C/O CASTLE PINES, INC.
501 Silverside Road, Suite 87
Wilmington, DE 19809

BOSS BADDIES LLC
C/O REGISTERED AGENTS INC.
2800 E Enterprise Avenue, Suite 333
Appleton, WI 54913-7889

MOXY MANAGEMENT
C/O ERESIDENTAGENT, INC.
9000 Sunset Boulevard, Suite 1260
Los Angeles, CA 90069

UNRULY AGENCY LLC (also d/b/a DYSRPT AGENCY)
C/O VCORP AGENT SERVICES, INC.
25 Robert Pitt Drive
Monsey, NY 10952

BEHAVE AGENCY LLC
C/O VCORP AGENT SERVICES, INC.
25 Robert Pitt Drive
Monsey, NY 10952

A.S.H. AGENCY
C/O Harold Laufer
216 S Hamilton Drive, Unit A
Beverly Hills, CA 90211

CONTENT X, INC.
C/O Reggie Gooden
21800 W Oxnard Street, Suite 940
Woodland Hills, CA 91367

VERGE AGENCY, INC.
10960 Wilshire Boulevard, 5th Floor
Los Angeles, CA 90024

ELITE CREATORS LLC
C/O Andrew Bachman
205 SE 20th Street,
Fort Lauderdale, FL 33316